

**Statement of Susan Veigel Dickey**  
**submitted to North Dakota Public Service Commission**  
**regarding**  
**Antelope Valley Station to Neset Transmission Project**  
**September 4, 2013**

As a fourth generation Killdeer Mountain land owner, I want to call the Public Service Commission's attention to serious issues concerning Basin Electric Power Cooperative's proposal to construct new transmission lines and a substation near Gumbo Creek north of Killdeer.

A review of the detailed maps available at the Service website clearly shows that the newly proposed substation would be constructed on Section 31 of Township 146, Range 95 which is within the boundary of the Killdeer Mountain Battlefield as identified by the National Park Service in its 2010 survey of the historic area\*. The Cooperative thus is adding insult to injury in not only constructing its lines within the battlefield's boundaries but in adding this 12 acre substation!

This should come as no surprise. The 2012 Draft Environmental Impact Statement for this project prepared by U.S. Department of Agriculture (USDA), Rural Utilities Service makes only a passing reference to this historically significant Civil War battle, one of only five in North Dakota. It states: "In 1864, following the Minnesota Sioux uprising of 1862, the U.S. Army under the command of General Sully engaged group of Teton, Yanktonai, and Dakota Sioux in the Killdeer Mountains. The location of that battle is now a state historic site (Snortland, 1999)."

This reference is totally misleading; the State historic site consists of only one acre! In fact, the battlefield has been studied several times in the interest of historic and cultural preservation. The 2010 National Park Service Study\* delineated over 17,000 acres of the battlefield as eligible for registration on the National Register of Historic Places.\*\* Not only would the Gumbo Creek Substation be within these boundaries, but the several miles of the proposed transmission lines as well.



It should be clear to this Commission that the paths of the proposed transmission and associated facilities require further study, and that additional alternatives be developed that do not intrude on the battlefield or on the viewscape of the Killdeer Mountains which in themselves constitute a unique resource in Western North Dakota.

The need for additional alternative analysis is further demonstrated by the recent announcement that Basin Electric wishes to construct both of the routes analyzed in the draft EIS. Consequently, there remain no alternatives to the proposed routes to be considered by North Dakota and the Department of Agriculture. This clearly violates the Council on Environmental Qualities regulations regarding preparation of an environmental impact statement which state: "It shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment."

The Commission should not agree to shortcut the processes leading to this important decision that will impact the area for generations. Before making any decision, the Commission should insist that Basin Electric develop alternatives that avoid the adverse impacts of on unique historical, ecological, and cultural resources associated in the proposed routes. North Dakotans deserve no less. Indeed all of the nation's taxpayers who will be subsidizing these facilities through the Rural Utilities Service deserve that as well.

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\* <http://www.nps.gov/hps/abpp/cwsii/CWSACReportNorthDakotaUpdate.pdf>

\*\* See Attached map.